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8
9 **BEFORE THE**
BOARD OF REGISTERED NURSING
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. 2013 - 369

12 **CONSUELO VIZMANOS SHAW**
13 **10878 Macouba Place**
14 **San Diego, CA 92124**

A C C U S A T I O N

15 **Registered Nurse License No. 684865**

16 Respondent.

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18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

23 2. On or about July 28, 2006, the Board of Registered Nursing issued Registered Nurse
24 License Number 684865 to Consuelo Vizmanos Shaw (Respondent). The Registered Nurse
25 License was in full force and effect at all times relevant to the charges brought herein and will
26 expire on December 31, 2013, unless renewed.
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1 **FIRST CAUSE FOR DISCIPLINE**

2 (Disciplinary Action by Another California Health Care Professional Licensing Board)

3 8. Respondent has subjected her license to disciplinary action under Business and
4 Professions Code section 2761(a)(4) in that another California health care professional licensing
5 board disciplined a health care professional license held by Respondent.

6 The circumstances are as follows:

7 9. On or about December 5, 2010, in a prior disciplinary action entitled In the Matter of
8 the Accusation Against Consuelo Vizmanos Shaw before the Board of Vocational Nursing and
9 Psychiatric Technicians, in Case Number VN-2006-78, Respondent's license was surrendered to
10 the Board of Vocational Nursing and Psychiatric Technicians and constituted the imposition of
11 discipline against Respondent for gross negligence, incompetence, and unprofessional conduct.
12 That decision is now final and is incorporated by reference as if fully set forth.

13 **SECOND CAUSE FOR DISCIPLINE**

14 (Dishonesty-Making a False Statement of Fact Required to be Revealed on Renewal Application)

15 10. Respondent has subjected her license to disciplinary action under Business and
16 Professions Code section 2761(e) in that she gave a false statement or information in connection
17 with the application for issuance of her registered nurse license.

18 The circumstances are as follows:

19 11. On or about December 5, 2010, in a prior disciplinary action entitled In the Matter of
20 the Accusation Against Consuelo Vizmanos Shaw before the Board of Vocational Nursing and
21 Psychiatric Technicians, in Case Number VN-2006-78, Respondent's vocational nurse license
22 was surrendered to the Board of Vocational Nursing and Psychiatric Technicians and constituted
23 the imposition of discipline against Respondent for gross negligence, incompetence, and
24 unprofessional conduct. That decision is now final and is incorporated by reference as if fully set
25 forth.

26 12. On or about November 15, 2011, Respondent completed an online renewal form in
27 connection with the renewal of her registered nursing license. Respondent was asked "Since
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1 you last renewed your license, have you had any license disciplined by a Government agency or
2 other disciplinary body..." In response, Respondent said "NO."

3 13. On or about July 2, 2010, Respondent signed a Stipulated Surrender of License and
4 Order in Case Number VN-2006-78, referenced in paragraph 11, above, stating that she had
5 carefully read the Stipulated Surrender of License and Order, fully discussed it with her attorney,
6 and understood it and the effect it would have on her Vocational Nurse license. In the Stipulated
7 Surrender of License and Order, it states that the "surrender of Respondent's Vocational Nurse
8 License and the acceptance of the surrendered license by the Board shall constitute the imposition
9 of discipline against Respondent."

10 **PRAYER**

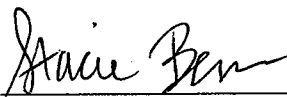
11 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
12 and that following the hearing, the Board of Registered Nursing issue a decision:

13 1. Revoking or suspending Registered Nurse License Number 684865, issued to
14 Consuelo Vizmanos Shaw;

15 2. Ordering Consuelo Vizmanos Shaw to pay the Board of Registered Nursing the
16 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
17 Professions Code section 125.3;

18 3. Taking such other and further action as deemed necessary and proper.
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21 DATED: November 5, 2012

22 *for* 
23 LOUISE R. BAILEY, M.ED., RN
24 Executive Officer
25 Board of Registered Nursing
26 Department of Consumer Affairs
27 State of California
28 Complainant

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